

Message

From: Jennifer Gavaldon [jgavaldon@greenleaf-power.com]
Sent: 7/13/2020 9:10:09 PM
To: Chew, Andrew [Chew.Andrew@epa.gov]
CC: Connolly, Scott [Connolly.Scott@epa.gov]
Subject: RE: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Good Afternoon Andrew,

I wanted to find out if you have had any luck with responses to my questions. I have copied the original email below so that you don't need to scroll through the emails.

I was referred to your Department by Laweeda Ward. DVP has preliminary data that we may have failed our Boiler MACT compliance test for HCL. Again, this is preliminary, but when the final report comes out I want to be in front of the ball.

Also, please note the following: EPA Region 9 just proposed DVP's part 71 renewal permit which should clearly delineate subpart DDDDD testing and notification procedures.

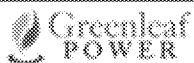
Below are my questions.

- 1) Can we retest using the same test plan (26a) and procedure as soon as we can get an approved tester onsite, or are we required to wait the 30 days for notices?
 - a. Right now our Contractor isn't available till August 17th but I expect the final report at the end of this month.
- 2) Once we have the final report (expected late July), do we make Boiler MACT notifications to EPA and SCAQMD? Note that we are on tribal land. Or just EPA and copy SCAQMD?
- 3) Just to verify, when we receive the final compliance report, and we show that we tested high in HCL, we are required to make a call within 48 hours to the EPA, and send a written notice/certified response within 10 working days. Correct?

I just want to be ahead of the game, and wasn't sure if the Boiler MACT compliance had separate reporting requirements. I couldn't find any.

Thank you again,

Jennie Gavaldon
Corporate EH&S Manager
2600 Capital Avenue, Suite 430
Sacramento Ca, 95816
Mobile - (951) 634-2395
www.greenleaf-power.com

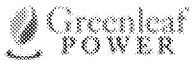


From: Jennifer Gavaldon
Sent: Wednesday, July 8, 2020 12:42 PM
To: Chew, Andrew <Chew.Andrew@epa.gov>
Cc: Connolly, Scott <Connolly.Scott@epa.gov>

Subject: RE: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Thank you so much for your assistance.

Jennie Gavaldon
Corporate EH&S Manager
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Sacramento Ca, 95816
Mobile - (951) 634-2395
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From: Chew, Andrew <Chew.Andrew@epa.gov>
Sent: Wednesday, July 8, 2020 12:11 PM
To: Jennifer Gavaldon <jgavaldon@greenleaf-power.com>
Cc: Connolly, Scott <Connolly.Scott@epa.gov>
Subject: RE: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Jennifer,

Thank you for your questions. Scott and I are working on a response. We'll be your contacts and be in touch.

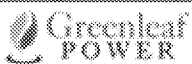
- Andrew

Andrew Chew, P.E.
chew.andrew@epa.gov
U.S. EPA, Region 9, Enforcement & Compliance Assurance Division (ECAD), Air Section (ENF-2-1) | 75 Hawthorne St.,
San Francisco, CA 94105

From: Jennifer Gavaldon [<mailto:jgavaldon@greenleaf-power.com>]
Sent: Tuesday, July 7, 2020 4:47 PM
To: Miller, Amy <Miller.Amy@epa.gov>
Cc: Brahmbhatt, Roshni <brahmbhatt.Roshni@epa.gov>
Subject: RE: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Thank you for your help.

Jennie Gavaldon
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From: Miller, Amy <Miller.Amy@epa.gov>

Sent: Tuesday, July 7, 2020 4:46 PM

To: Jennifer Gavaldon <jgavaldon@greenleaf-power.com>

Cc: Brahmabhatt, Roshni <brahmabhatt.Roshni@epa.gov>

Subject: RE: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Dear Jennifer:

Thank you for your questions. Roshni Brahmabhatt, the Air Enforcement Manager, will reach out to you to get further clarity on your questions.

Regards,

Amy C. Miller

Director, Enforcement & Compliance Assurance Division

U.S. Environmental Protection Agency, Region IX

(415) 947-4198

miller.amy@epa.gov

From: Jennifer Gavaldon <jgavaldon@greenleaf-power.com>

Sent: Tuesday, July 7, 2020 12:32 PM

To: Miller, Amy <Miller.Amy@epa.gov>

Subject: Boiler MACT Annual compliance test potentially high HCL-Reporting DVP (Desert View Power) Permit No. CB-OP 99-01

Good Afternoon Ms. Miller,

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